

Case 4:19-cr-00170-ALM-KPJ *SEALED* Document 1 Filed 07/09/19 Page 1 of 7 PageID #: 1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

United States Courts
Southern District of Texas
FILED

July 26, 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

CHIJOKE MADUEWESI (1)

§
§
§
§
§
§

No. 4:19CR

Judge

170
Mazzant
SEALED

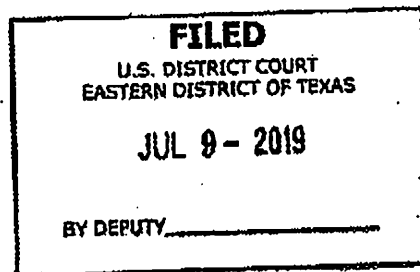
4:19mj1380

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

At all times material to this Indictment:

INTRODUCTION



1. Bank of America Corporation (Bank of America) was an American multinational investment bank and financial services company based in Charlotte, North Carolina with approximately 4,345 branches in 35 states and was insured by the Federal Deposit Insurance Corporation (FDIC). Bank of America had branches in the Eastern District of Texas, including branches in Allen, Lucas, Murphy and Wiley, Collin County, Texas.

2. Key Bank National Association (Key Bank) was a regional bank headquartered in Cleveland, Ohio, with approximately 1151 branch locations in 16 states and insured by the FDIC. Key Bank offered a certain type of loan known as a HELOC, which stands for home equity line of credit. It is a line of credit secured by a borrower's equity in their home. A HELOC allows the home owner to borrow, as needed, up to a

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certain amount, with their home as collateral.

Count One

Violation: 18 U.S.C. §1349
(Conspiracy to Commit Bank Fraud)

THE CONSPIRACY AND ITS OBJECTS

3. From on or about November 23, 2018, to on or about January 29, 2019, in the Eastern District of Texas, and elsewhere, **CHIJIOKE MADUEWESI** and [REDACTED] defendants herein, conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, knowingly executed a scheme to defraud a financial institution using counterfeit checks, in violation of Title 18, United States Code, Section §1344.

ACTS IN FURTHERANCE OF THE CONSPIRACY

4. In furtherance of the conspiracy and to accomplish its objects, defendants **CHIJIOKE MADUEWESI** [REDACTED] committed the following overt acts, among others, in the Eastern District of Texas and elsewhere.

- a. On or about November 26, 2018, defendant [REDACTED] deposited a counterfeit check payable to him in the amount of \$29,900, drawn on Key Bank account number [REDACTED] 7252. This deposit was made at a walk up ATM at the Bank of America Financial Center located at 625 W Dekalb Pike STE 100, King of Prussia, PA 19406. This counterfeit check was supplied by defendant

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CHIJIOKE MADUEWESI Bank of America froze [REDACTED] account

following this deposit preventing these funds from being removed.

- b. On or about January 4, 2019, defendant [REDACTED] recruited subject J.Y. to deposit a counterfeit check into J.Y.'s Bank of America account.
- c. On or about January 8, 2019, defendant **CHIJIOKE MADUEWESI** arranged for a counterfeit check payable to J.Y. in the amount of \$37,900, drawn on Key Bank account number [REDACTED] 8317 to be shipped from an unknown location to defendant [REDACTED] at his home address in Wylie, Collin County, Texas, within the Eastern District of Texas.
- d. On or about January 10, 2019, subject J.Y., at the direction of defendant [REDACTED] [REDACTED] deposited this counterfeit check payable to J.Y. in the amount of \$37,900, drawn on Key Bank account number [REDACTED] 8317. This deposit was made at a walk-up ATM at the Bank of America Financial Center located at 1301 W. FM 544, Wylie, Collin County, TX 75098, within the Eastern District of Texas.
- e. From on or about January 19, 2019, to on or about January 24, 2019, J.Y., at the direction of defendants **CHIJIOKE MADUEWESI** [REDACTED] [REDACTED] removed \$37,200 from his Bank of America account via Bank of America branches or ATMs, all in Collin County, Eastern District of Texas, in the following withdrawals:

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Date	Withdrawal Amount	Teller or ATM	City
1/19/2019	\$8,000	Teller	Murphy
1/19/2019	\$60	ATM	Murphy
1/19/2019	\$500	ATM	Wiley
1/19/2019	\$400	ATM	Wiley
1/20/2019	\$500	ATM	Wiley
1/20/2019	\$480	ATM	Wiley
1/21/2019	\$500	ATM	Murphy
1/21/2019	\$500	ATM	Murphy
1/22/2019	\$8,000	Teller	Wiley
1/22/2019	\$500	ATM	Wiley
1/22/2019	\$480	ATM	Wiley
1/23/2019	\$8,000	Teller	Allen
1/23/2019	\$500	ATM	Allen
1/23/2019	\$480	ATM	Allen
1/24/2019	\$8,000	Teller	Lucas
1/24/2019	\$300	ATM	Lucas

J.Y. gave all of this cash to defendant [REDACTED] who in turn gave a portion of it to defendant **CHIJIOKE MADUEWESI**.

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- f. On or about January 28, 2019, defendant **CHIJOKE MADUEWESI** arranged for a counterfeit check payable to J.Y. in the amount of \$37,200, drawn on Key Bank account number [REDACTED] 3059 to be shipped via Federal Express Overnight Delivery from Mount Vernon, NY to defendant [REDACTED] at his home address in Wylie, TX.
- g. On or about January 29, 2019, subject J.Y. deposited this counterfeit check payable to him in the amount of \$37,200, drawn on Key Bank account number [REDACTED] 3059. This deposit was made at a walk-up ATM at the Bank of America Financial Center located at 1301 W. FM 544, Wylie, TX 75098. Bank of America froze J.Y.'s account following this deposit preventing these funds from being removed.

All in violation of 18 U.S.C. §1349 (18 U.S.C. §1344).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

Pursuant to 18 U.S.C. § 982(a)(2)(A)

As a result of committing the offense charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(A), all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

1. \$19,860 cash seized from defendant [REDACTED] by the Wylie Police Department on 1/22/19.

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2. Funds seized (\$37,061.40) from subject J.Y.'s Bank of America account pursuant to Seizure Warrant issued by the Eastern District of Texas on April 5, 2019.

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL


GRAND JURY FOREPERSON

JOSEPH D. BROWN
UNITED STATES ATTORNEY


Kevin McClendon
Assistant United States Attorney

7/9/19
Date

AO 442 (Rev. 11/11) Arrest Warrant

10928131

UNITED STATES DISTRICT COURT

for the
Eastern District of Texas

SEALED

United States of America

v.

Chijioke Maduewesi

Case No. 4:19-cr-00170-ALM-KPJ

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

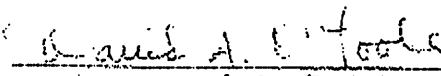
(name of person to be arrested) Chijioke Maduewesi

who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1349 - Conspiracy to Commit Bank Fraud

Date: 07/09/2019City and state: Sherman, TX

 Issuing officer's signature

 David A. O'Toole, Clerk
 Printed name and title


Return

 This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

 Arresting officer's signature

 Printed name and title